

UNITED STATES DISTRICT COURT  
DISTRICT OF MINNESOTA  
FOURTH DIVISION

US EPA RECORDS CENTER REGION 5



514440

UNITED STATES OF AMERICA,

Civil No. 4-80-469

Plaintiff,

and

STATE OF MINNESOTA, by its  
Attorney General, Hubert H.  
Humphrey, III, its Department  
of Health, and its Pollution  
Control Agency,

Plaintiff-Intervenor,

vs.

REILLY TAR & CHEMICAL CORPORATION;  
HOUSING AND REDEVELOPMENT AUTHORITY  
OF ST. LOUIS PARK; OAK PARK VILLAGE  
ASSOCIATES; RUSTIC OAKS CONDOMINIUM,  
INC.; and PHILIP'S INVESTMENT CO.,

Defendants,

and

CITY OF ST. LOUIS PARK,

Plaintiff-Intervenor,

vs.

REILLY TAR & CHEMICAL CORPORATION,

Defendant,

and

CITY OF HOPKINS,

Plaintiff-Intervenor,

vs.

REILLY TAR & CHEMICAL CORPORATION,

Defendant.

AFFIDAVIT OF  
JOHN C. CRAUN

John C. Craun, being first duly sworn, states as follows:

1. I am a chemical engineer employed by Environmental Research & Technology, Inc. ("ERT"), Pittsburgh, Pennsylvania. I received my degree in Chemical Engineering/Engineering and Public Policy from Carnegie-Mellon University. I am a registered professional engineer in Pennsylvania.

2. ERT was hired by the law firm of Dorsey & Whitney to study the soil and ground water contamination problems in St. Louis Park, Minnesota. I am the project manager for this study. In May of 1983, ERT published a report entitled, "Recommended Plan for a Comprehensive Solution of the Polynuclear Aromatic Hydrocarbon Contamination Problem in the St. Louis Park area."

3. Preparation of the above-referenced ERT report included extensive monitoring, sampling, chemical assays, identification of ground water and soil constituents and ground water modeling of the St. Louis Park area.

4. ERT's investigation and research of polynuclear aromatic hydrocarbon (PAH) contamination in the St. Louis Park ground water has also revealed the presence of ground water contamination from other chemical constituents including benzene, chlorinated solvents such as trichloroethylene and 1,2-dichloroethylene, gasoline and oils, petroleum by-products, chloride, sulfate and other organic and inorganic materials.

